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8	Autoritys for the Onneu States	
9	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
10		C N 004 00405 PEP PW
11	Julia Aguirre Rodriguez,	Case No. 2:21-cv-00437-RFB-EJY
12	Petitioner, v.	Stipulation and Order to Extend Deadlines (First Request)
13	Merrick Garland, Attorney General, et al.,	, ,
14		
15	Respondents.	
16	Pursuant to Local Rules IA 6-1 and 26-4, Petitioner Juila Aguirre Rodriguez, and	
17	Respondents Merrick Garland, et al., through counsel, submit the following Stipulation to	
18	Extend Deadlines. This is the first request for an extension of case deadlines. The parties	
19	enter this stipulation because:	
20	1. On March 16, 2021, Petitioner filed her Petition for Writ of Habeas Corpus	
21	(ECF No. 1) and Motion for Temporary Restraining Order (ECF No. 4).	
22	2. On March 18, 2021, the Court granted Petitioner's Motion for Temporary	
23	Restraining Order (ECF No. 11). The Court's order provided that "[t]he Department of	
24	Homeland Security and the Department of Immigration and Customs Enforcement are	
25	hereby ORDERED not to enforce the BIA's January 19, 2021 Order." (ECF No. 11 at 6).	
26	The Court's order further provided that the BIA's order should be suspended and held in	
27	abeyance during the pendency of the case. (ECF No. 11 at 7). The Court scheduled a	
28	hearing on the Motion for Temporary Restraining Order for April 1, 2021 at 11:00 a m	

Finally, the Court ordered Respondents to file a response to the Motion for Temporary Restraining Order by March 25, 2021 and for Petitioner to file a reply by March 30, 2021 (ECF No. 11 at 7).

- 3. The requested extension will provide Respondents with additional time to respond to the Motion for Temporary Restraining Order and aid in avoiding scheduling conflicts of Petitioner's counsel.
- 4. Accordingly, the parties request that Respondents' response be filed by **April 22, 2021**, Petitioner's reply be filed by **April 29, 2021**, and the Court hold a hearing on the motion on **April 30, 2021 at 10:00 AM by video conference before Judge Richard F. Bouleware, II.**

1 5. The Court's order granting Petitioner's Temporary Restraining Order will 2 remain in effect during this period of extended deadlines. 3 Respectfully submitted this 24th day of March 2021. 4 VALDEZ LAW FIRM, APC. CHRISTOPHER CHIOU 5 Patrick Valdez (NV Bar No. 11005) Acting United States Attorney 10305 Hawthorne Blvd. 6 Inglewood, CA 90304-1509 Patrick@Valdez-law.com /s/ Skyler Pearson 7 SKYLER H. PEARSON ANDRES ORTIZ LAW Assistant United States Attorney 8 Andres Ortiz (CSBN 279239)* 320 Pine Ave, Suite 608 Attorneys for the United States 9 Long Beach, CA 90802 Andres.Ortiz@andresortizlaw.com 10 *Pro Hac Vice Application Pending 11 /s/ Andres Ortiz ANDRES ORTIZ 12 320 Pine Ave., Suite 608 13 Long Beach, CA 90802 Andres.Ortiz@andresortizlaw.com 14 Attorneys for Petitioner 15 16 17 IT IS SO ORDERED 18 19 RICHARD F. BOULWARE, II 20 UNITED STATES DISTRICT JUDGE 21 22 **DATED:** March 29, 2021 23 24 25 26 27 28